UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Via U.S. Postal Service and Electronic Mail

December 9, 2013

Ms. Mary Zepeda, Project Manager
Safety, Security & Compliance Organizational Unit
Corporate Environmental Health and Safety
Technical Services Division
Hazardous Materials Section
Southern California Edison
1218 South 5th Avenue
Monrovia, CA 91016

Re: Toxic Substances Control Act Polychlorinated Biphenyls (PCBs) – USEPA Approval – PCB Spill Notification Follow Up: Cal-EMA No.12-1445/NRC1005673, March 13, 2012 (32173 Sailview Lane, Westlake Village, CA [Westlake #2]) and Cal-EMA No.13-5411, August 29, 2013 (3453 Iroquois, Long Beach, CA [Iroquois])

Dear Ms. Zepeda:

The U.S. Environmental Protection Agency Region 9 (USEPA) is following up on PCB spill cleanup work remaining to be completed in relation to Cal-EMA spill notifications 12-1445 (Westlake #2) and 13-5411 (Iroquois). USEPA is following up on these matters under the Toxic Substances Control Act regulations in 40 CFR 761.61(c) for risk-based PCB cleanups. Sections A and B of this letter contain USEPA's (1) approval of SCE's health risk assessment work plan and (2) comments on SCE's work plan for analysis of vegetable consumption, respectively.

SCE responded to the subject PCB spill events consistent with 40 CFR 761 Subpart G (PCB Spill Cleanup Policy). These PCB spills, which occurred in residential areas, impacted ground water (Westlake #2) and a homegrown vegetable garden (Iroquois).[1] These two spill scenarios are excluded from the numerical cleanup standards in Subpart G. Therefore, consistent with Subpart G, USEPA requested that SCE conduct additional work at Westlake #2 and Iroquois consistent with 40 CFR 761.61(c).

Section A – Westlake #2

USEPA is approving SCE's "Work Plan for Health Risk Assessment Methodology for 32173 Sailview Lane, Westlake Village, CA." This approval is effective on the date of this letter.

On August 15, 2013, USEPA approved with conditions SCE's "Sampling and Analysis Plan (SAP) 32173 Sailview Lane Westlake Village, California SCE Structure #5024467" (SAP). Consistent with

[1] The spill at Westlake #2 was due to failure of a buried underground residential distribution (BURD) transformer with mineral oil containing 358 mg/kg (1968, General Electric, Serial # H234400P68A). The spill at Iroquois was due to failure of a pole mounted transformer with mineral oil containing 70 mg/kg total PCBs.

that SAP, SCE conducted additional soil and ground water sampling at Westlake #2 to suppport the health risk assessment work plan being approved here. SCE intends to demonstrate that residual PCB concentrations in soils and ground water at the impacted property do not represent a health risk.

Section B - Iroquois

Below are USEPA's comments on SCE's *"Workplan for the Analysis of the Vegetable Consumption Pathway for PCBs in Garden Produce."* Please submit a revised work plan within seven (7) business days after the date of this letter that is responsive to the comments below. If SCE would like a conference call with USEPA to discuss the comments before revising the plan, please schedule that call within three (3) business days after the date of this letter.

- The "transfer factor" or bioaccumulation factor used is much less conservative than at least one other empirical factor reported. The November, 2000 ATSDR Toxicological Profile for PCBs presents a review of Plant Uptake Factors in Table 6-8, which presents several more conservative transfer factors and cites Cullen et al, 1996 (attached) as the basis for several of the factors presented. Additionally, an updated and thorough review of the available literature, including Blankenship, et al., 2005 (attached), might provide even more conservative values. Absent a compelling technical basis for doing otherwise, the most conservative available factor should be identified used.
- The ingestion rate used for the homegrown produce is much lower than suggested in EPA's 2011 Exposure Factors Handbook. Values from Exposure Factors Handbook should be used.
- Exposure to above-ground and below-ground produce should not be segregated. It is unclear how that issue was addressed in their analysis.
- Accordingly, the analysis performed did not adequately address reasonable maximum exposure (RME) and should be revised to incorporate the above comments.

The modeling to be conducted following the work plan, as revised by the above comments, may predict very low soil cleanup levels for PCBs. USEPA Method 1668C may not have detection limits that are sensitive enough to analyze soil samples at a level of confidence that allows comparison of the analytical results to the cleanup level.

Section C - Completion of PCB Cleanups at Westlake #2 and Iroquois

USEPA appreciates SCE's work in cleaning up PCBs at Westlake #2 and Iroquois and completing the remaining work associated with those cleanups. The cleanups will be deemed complete after USEPA approves final cleanup completion reports for both spill sites to be submitted by SCE. Such reports must be consistent with Condition 7 in USEPA's August 15, 2013 approval.

Regarding Iroquois, matters associated with food chain impacts are complex. Please schedule a conference call with USEPA after the modeling is completed as revised in the above Section B.

If you have any questions concerning this letter, please call Carmen D. Santos (USEPA R9 PCB Coordinator) at 415.972.3360. Thank you.

Sincerely,

Jeff Scott, Director
Waste Management Division

Cc: Peter Raftery, RWQCB, Los Angeles
Steve Armann, USEPA R9
Carmen D. Santos, USEPA R9
John Beach, USEPA R9